

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re:

PROMESA
Title III

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*

(Jointly Administered)

Debtors.¹
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**APPLICATION FOR ADMISSION
PRO HAC VICE OF KELLY M. CURTIS**

COMES NOW, Kelly M. Curtis, applicant herein, pursuant to Local Civil Rule 83A(f), which applies to this proceeding pursuant to Local Rule of Bankruptcy Procedure 2090-1(c), which in turn applies to this proceeding pursuant to Section 3010 of the Puerto Rico Oversight, Management and Economic Stability Act (“PROMESA”), and respectfully states:

1. Applicant is an attorney and a member of the law firm of Proskauer Rose LLP, with offices at: 2029 Century Park East, Suite 2400, Los Angeles, CA 90067.

2. Applicant will sign all pleadings with the name Kelly M. Curtis.

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

3. Applicant has been retained as a member of the above-named firm by the Financial Oversight and Management Board for Puerto Rico (“FOMB”) to provide legal representation in connection with the above-styled matters now pending before the United States District Court for the District of Puerto Rico.

4. Since 2016, applicant has been and presently is a member in good standing of the bar of the State of California, where applicant regularly practices law. Applicant’s bar license number is 313581.

5. Applicant has been admitted to practice before the following courts:

<u>Court:</u>	<u>Admission Date:</u>
U.S. Circuit Court of Appeals, Ninth Circuit	2018
U.S. District Court, Central District of California	2018

6. Applicant is a member in good standing of the bar of the court listed in paragraph 5.

7. Applicant is not currently suspended from the practice of law before any court or jurisdiction.

8. Applicant is not currently the subject of any complaint for unethical conduct, disciplinary proceeding or criminal charges before any court or jurisdiction.

9. Local counsel of record associated with applicant in this matter is:

Hermann D. Bauer
USDC No. 215205
O' NEILL & BORGES LLC
250 Muñoz Rivera Ave., Suite 800
San Juan, PR 00918-1813
Tel: (787) 764-8181
Fax: (787) 753-8944
Email: hermann.bauer@oneillborges.com

10. Applicant has read the Local Civil Rules of the United States District Court for the District of Puerto Rico and will comply with the same.

11. Applicant has read the Local Civil Rules of the United States District Court for the District of Puerto Rico which provide in part that attorneys appearing *pro hac vice* must comply with the provisions set forth therein and pay an admission fee of \$300.00 per appearance in each new case before the court. Accordingly, receipt of payment of the *pro hac vice* admission fee is attached hereto.

12. WHEREFORE, applicant respectfully requests to be admitted to practice in the United States District Court for the District of Puerto Rico for the above-styled cases only.

Date: August 29, 2019

Respectfully submitted,

/s/ Kelly M. Curtis
Kelly M. Curtis (CA-313581)
PROSKAUER ROSE LLP
2029 Century Park East
Los Angeles, CA 90067
Suite 2400
Tel: (310) 284-4592
Fax: (310) 557-2193
Email: kcurtis@proskauer.com

I HEREBY CERTIFY, pursuant to Local Civil Rule 83A(f), that we consent to the designation of local counsel of record for all purposes.

Date: August 29, 2019

Respectfully submitted,

/s/ Hermann D. Bauer
Hermann D. Bauer
USDC No. 215205
O' NEILL & BORGES LLC
250 Muñoz Rivera Ave., Suite 800
San Juan, PR 00918-1813
Tel: (787) 764-8181
Fax: (787) 753-8944
Email: hermann.bauer@oneillborges.com

I HEREBY CERTIFY that on this same date the foregoing motion was filed with the Clerk of the Court using the CM/ECF system of the US Bankruptcy Court for the District of Puerto Rico for Case No. 17 BK 3283, which will send notification of such filing to all attorneys of record, and the original was served upon the Clerk of Court on August 29, 2019, accompanied by a \$300.00 *pro hac vice* admission fee.

Respectfully submitted, in San Juan, Puerto Rico, this 29th day of August, 2019.

/s/ Hermann D. Bauer

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/s/ Kelly M. Curtis

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THE COMMONWEALTH OF PUERTO RICO, *et al.* (Jointly Administered)
Debtors.¹
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**ORDER GRANTING ADMISSION
PRO HAC VICE OF KELLY M. CURTIS**

This Court, having considered the above Application for Admission *Pro Hac Vice*, orders that:

 the application be granted. The Clerk of Court shall deposit the admission fee to the account of Non-Appropriated Funds of this Court.

 the application be denied. The Clerk of Court shall return the admission fee to the applicant.

SO ORDERED.

In San Juan, Puerto Rico, this _____ day of _____, 2019.

U.S. District Judge

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